

PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE
Associate General Counsel
Office of Program Litigation, Office 7
MARGARET BRANICK-ABILLA (CABN 223600)
Special Assistant United States Attorney
Office of Program Litigation, Office 7
Office of the General Counsel
Social Security Administration
6401 Security Boulevard
Baltimore, MD 21235
Telephone: (510) 970-4809
Email: Margaret.Branick-Abilla@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

MELISSA ANN OROZCO,

Civil No. 1:23-cv-01373-SKO

Plaintiff,

**STIPULATION AND UNOPPOSED MOTION
FOR AN EXTENSION OF TIME; ORDER**

COMMISSIONER OF SOCIAL SECURITY,

(Doc. 17)

Defendant.

(Doc. 17)

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, with this Court's approval, to extend the time by 40 days, from March 17, 2024, to April 26, 2024, for Defendant to file his Cross-Motion for Summary Judgment. Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

This is Defendant's first request for an extension of time. Plaintiff's counsel does not oppose the requested extension.

The undersigned counsel for the Commissioner respectfully submits that good cause exists for the requested extension. Due to ongoing staffing fluctuations and organizational changes, the undersigned counsel for the Commissioner has been tasked with additional duties including

1 serving as a jurisdictional coordinator, reviewing other attorneys' work, training and mentoring
2 new attorneys, and handling more cases, with responsibility for over 40 cases pending in District
3 Court and the Ninth Circuit, including a Ninth Circuit argument scheduled for April 1, 2024.
4 Additionally, the undersigned counsel for the Commissioner will be out of the office for almost
5 two weeks in March traveling with an aged parent. As a result, and despite diligent efforts to
6 comply with this Court's Scheduling Order, the Commissioner needs an extension in the instant
7 case to review the administrative record, consider the issues that Plaintiff has raised, confer with
8 his client as necessary, and prepare the Commissioner's Cross-Motion.

9 Respectfully submitted,

10 Dated: March 8, 2024

PENA & BROMBERG, PLC

12 By: /s/ Jonathan O. Pena*

13 JONATHAN O. PENA

14 Attorneys for Plaintiff

[*As authorized by e-mail on Mar. 8, 2024]

15 Dated: March 11, 2024

PHILLIP A. TALBERT

16 United States Attorney

17 MATHEW W. PILE

Associate General Counsel

18 Office of Program Litigation, Office 7

By:

/s/ Margaret Branick-Abilla

MARGARET BRANICK-ABILLA

Special Assistant United States Attorney

21 Attorneys for Defendant

22 ORDER

23 Pursuant to the parties' stipulation (Doc. 27), IT IS ORDERED that the Commissioner's
24 Cross-Motion for Summary Judgment shall be due on April 26, 2024, and Plaintiff's optional
25 reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

26 IT IS SO ORDERED.

27 Dated: March 11, 2024

/s/ Sheila K. Oberto

1 UNITED STATES MAGISTRATE JUDGE
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28